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Attorney for Defendant
ROBERT JAMES HANNA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT JAMES HANNA,

Defendant.

CASE NO. 2:20-CR-00006-KJM

**STIPULATION AND ORDER MODIFYING
BRIEFING SCHEDULE RE: DEFENDANT'S
MOTION PURSUANT TO 28 U.S.C. § 2255**

The United States, by and through its attorney of record, Michele Beckwith, and defendant Robert James Hanna, by and through his attorney of record, Erin J. Radekin, respectfully submit this stipulation and proposed order modifying the briefing schedule pertaining to Mr. Hanna's motion pursuant to 28 U.S.C. § 2255, ECF No. 41.

The parties agree and stipulate as follows:

1. Mr. Hanna's pro se motion under § 2255 was filed on September 8, 2022. ECF No. 41.
2. On January 11, 2023, the Court adopted the parties' stipulation modifying the briefing schedule pertaining to Mr. Hanna's § 2255 motion. ECF No. 48. Pursuant to the order, a supplemental brief in support of Mr. Hanna's motion, amended § 2255 motion, or notice of non-supplementation is due on January 31, 2023. *Id.*

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1 3. Ms. Radekin has ordered all pertinent records, reviewed all such records except for the plea
2 and sentencing transcripts (which she has ordered and obtained funding for, but not yet received),
3 consulted with her client and with prior counsel, Jessica Graves, and performed legal research.

4 4. The parties have conferred and agree that a modification of the briefing schedule is warranted
5 to allow Ms. Radekin to obtain and review the plea and sentencing transcripts and to continue her
6 investigation of Mr. Hanna's pro se claims as well as an additional issue raised by Ms. Radekin's
7 review.
8

9 5. The parties agree to the following modification of the briefing schedule to allow Ms. Radekin
10 to complete these tasks: an amended § 2255 motion, supplemental brief in support of Mr. Hanna's pro se
11 motion, or notice on non-supplementation, is due no later than **March 14, 2023**. The government's
12 opposition, or statement of non-opposition, is due **30 days after the amended § 2255 motion,**
13 **supplemental brief, or notice of non-supplementation is filed.** Any reply to the government's brief is
14 due **15 days after the government's brief is filed.**
15

16 IT IS SO STIPULATED.

17 Respectfully submitted,

18 Dated: January 31, 2023

/s/ Phillip A. Talbert
PHILLIP A. TALBERT
United States Attorney

/s/ Michele Beckwith
MICHELE BECKWITH
Assistant United States Attorney

23 Dated: January 31, 2022

/s/ Erin J. Radekin
ERIN J. RADEKIN
Counsel for Defendant
ROBERT JAMES HANNA

ORDER

IT IS SO ORDERED this 21st day of February, 2023.



CHIEF UNITED STATES DISTRICT JUDGE